



June 5, 2008

**POLICY ISSUES FOR THE DEVELOPMENT OF NEW PRINCIPLES AND GUIDELINES  
UNDER SECTION 2031 OF PUBLIC LAW 110-114**

The Water Resources Coalition (WRC) is pleased to offer the following comments for the record of June 5, 2008, regarding recommendations for the revision of the Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies, dated March 10, 1983.

WRC was established in 2007 to promote the development, implementation and funding of a comprehensive national water resources policy. With member organizations representing state and local governments, conservation, engineering and construction ports, waterways and transportation services, the Coalition works to ensure that a comprehensive , national water resources policy is developed, implemented and funded to provide a sustainable, productive economy; healthy aquatic ecology; and public health and safety.

We believe that the new paradigm for planning and managing the nation's investments in water resources must have the active participation of all levels of our federal system of government effective planning is fundamental for the infrastructure investments that need to be made in this country.

We offer these initial recommendations for consideration as you develop your initial draft of the revision and we plan on providing specific comments on the expected draft document.

We believe that the revised P&G must:

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**improve, prevent, save**  
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1. Use, for purposes of evaluating and improving program management under the new Principles and Guidelines, the present Corps of Engineers core functions for guiding the strategic goals associated with the Strategic Plan of the organization. Those core functions include: flood control, hydropower, navigation, regulatory, recreation, emergency management and water supply.
2. Establish a process where collaboration with financial and technical assistance to state and local water resource planning is the cornerstone for national water resource planning. Any such planning information from that effort should be incorporated into the federal objectives in order to provide a context for non-federal financing or innovative federal financing.
3. Incorporate risk management into a public safety benefit and objective, emphasizing structural and non-structural solutions.
4. Limit the re-evaluation and application of Principles and Guidelines to all projects authorized by Congress after the promulgation of the new Principle and Guidelines pursuant to the requirements of section 2031 of the Water Resources Development Act of 2007 (Pub.L. 110-114).
5. Require the Corps to undertake, before any implementation of the new Principles and Guidelines occur, a comprehensive review of the Procedures that accompany the Principles and Guidelines to ensure that there is consistent implementation and application of the new Principles and Guidelines across all USACE Districts.
6. Contain a requirement for the Corps to update the Principles and Guidelines on a regular basis (e.g., whenever the Corps updates its Strategic Plan) as part of an effort of maintaining an open and understandable process.
7. Require consideration of “other social effects” as part of the equation of the evaluation of economic benefits.

In conclusion, we hope the revision recognizes the need to be flexible, timely, and open to innovation in the market place of water-resource planning. Your effort should be state-of-the-art with regard to new and original thinking.

We fully expect that the Corps will embrace the spirit as well as the letter of section 2031 in revising the Principles and Guidelines to ensure a transparent process that provides for a stronger role for non-federal partners, other stakeholders, and the beneficiaries of Corps water resources programs in the planning, decisionmaking, and implementation of projects.

Thank you for considering our thoughts on this important part of the nation’s water development program.